

**Comments to Council on Planned Development proposal**

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From Planning Commissioner Jean Wilson

**TOWN OF LOOMIS**

This is to share my concerns and why I voted No when the PD proposal came the Planning Commission. I do not believe we had adequate information to pass something of such potential impact to the Town and I did not find my questions adequately addressed, nor did the ordinance to me seem adequate to assure the Town's perspectives in creating PD zones.

I do not see PDs as necessary for Loomis. Yes, they do allow flexibility and *theoretically* could result in a "better" project (whose perspective?). But the examples cited in the Commission's staff report do not seem persuasive.

**a. The General Plan does not require PD for the entire town.** The passage cited to the Planning Commission was misleadingly taken out of context. The sentence about PD being required is actually from a paragraph on providing for clustering in larger rural parcels, and should not be generalized to include the entire town. The town did provide for rural clustering through the zoning ordinance specifics desired by Loomis, rather than the more nebulous PD. One clustered development has been approved under that ordinance. PDs are not necessary for the whole town under this citation.

**b. PD is not required for mixed use.** Loomis already allows for Mixed Use in commercial areas. One such project was already approved (though not built). The Village is also proposing mixed use under our current ordinances.

**c. PD is not necessary for Smart Growth.** From the beginning the Town has incorporated smart growth principles, before the term was "in." Our basic principle of focusing density in the core area of town and transitioning to less density as we move to the more rural areas is also smart growth, promoting centralized density, pedestrian orientation, commercial activity and jobs where people live. We do not allow leapfrog development and urban sprawl cookie cutter subdivisions that would swallow up our rural lands (such as Loomis was incorporated against). We allow rural clustering. We also permit carriage houses. Our plans such as bikes and trails also promote smart growth principles. When Loomis signed on to the SACOG Blueprint program it was never suggested that we had to have PDs to have smart growth.

**d. It is not necessary to have a PD to approve the Costco location.** Yes, there needs to be a change to allow a larger commercial building than currently allowed, and it is true that simply changing the current CG zoning allowance would mean that building size could be allowable for all CG properties. However, an alternative is to rezone the parcel with another designation that does allow a larger building. After all, that corner was not always CG. In the previous general plan it was Shopping Center, a designation that was dropped in consolidating some of the commercial categories. It would seem reasonable to rezone it appropriately in view of the changed nature of Sierra College Bld., with all the increased commercial development and traffic as well as projected traffic from the Lincoln direction.

Loomis is known for being a stickler and keeping to its zoning, on purpose. We do not hand out zone changes freely. To my recollection the only ones we have made are a couple of cleanups from the General Plan (correct some spilt zoning) and then the increased density to get our required affordable housing behind Raley's. (Unfortunately, the Village developers now plan only market rate apartments, not the affordable ones zoned for. At the time, as our

Housing Element states, “the property owner is very willing to work with the Town to accommodate the RHNA and provide higher density and affordable housing.” Since this is no longer the case, it remains to be seen whether Loomis will need further rezoning to meet its housing requirement.) Loomis rezones infrequently and only for very good cause. But the Costco location certainly has many specific reasons to be considered for rezoning. The Town is allowed 2 General Plan changes per year, and ours are few and far between, so this route could be explored without needing to put PD eligibility on the whole town.

**e. PDs are not necessarily needed to bring in a good project.** Certainly they can offer flexibility, another “tool” for development. But are they really needed? The former Turtle Island developer managed to put together a fine project within the town zoning. (It did not fall through due to zoning problems.) Keeping our zoning intact and remembering what Loomis was looking for will help developers see where the boundaries are rather than encourage them to push the limits and see what they can get away with. If a project does need some tweaking to make it a better plan, we do have the option of some zone changes as long as we see that the overriding consideration is trying to fit into what Loomis really wants here, not what the developer sees as a “better” idea and one which makes him/her the most money. Our ordinances are not so rigid as not to be able to accommodate a range of ideas, and they were certainly done with a consultant who understood what Loomis was aiming for, not simply some imposed cookie cutter concepts such as we were seeing around us. Developers need to understand that Loomis is unique. Will putting a PD on a property encourage them to simply bring in something based on the “everybody else is doing it” rationale? That’s not Loomis.

**f. Planned Development is not a new planning concept nor is it new or unfamiliar to Loomis.** Actually, it was rejected. In the Town’s original General Plan, the Gates property behind Raley’s (now a major part of the Village project) had been designated PD. After study and discussion, this was removed in favor of specific zoning and policies on the recommendation of the General Plan Steering Committee, a removal subsequently approved by both the Planning Commission and Council. The Steering Committee’s vote was 7-2 in favor of removing the PD. (Joan Phillipe voted against removing the PD.) This is not even a close vote. So I would urge caution in overriding the views of those who removed the PD in the first place. As it is explained in the General Plan (Areas of Land Use Change, p. 30 my copy), the PD had been applied to this single site and “intended to ensure the proposed development would ensure a mix of uses, with new, higher-density residential uses providing a buffer between commercial development adjacent to I-80 and the existing single-family residential areas to the north. This General Plan has retained those objectives through specific policy language that has been applied to the site.” As you know, several well-attended public meetings and hearings were held over the zoning for these areas, resulting in the various commercial, office and residential zonings that were put in place to fulfill the objectives.

The staff report we received seemed to imply that our General Plan was too outdated to accommodate today’s needs and that it only provided for “cookie cutter” suburban style housing. That was exactly what Loomis didn’t want. Loomis provides for various opportunities that fit with our desire to remain a small town with a rural feel, with quality development. I believe these objectives can be achieved by creative developers without resorting to PDs.

Before you decide to put PDs back into our town planning, please think about why the General Plan steering committee, planning commission and council all decided to remove it from the property that would most come to mind for PD eligibility. Keep in mind that, as it was explained to the Planning Commission, PD removes the zoning and various standards, such as streets, parking, setbacks, density,

etc., in exchange for the possibility of a “better” project. Hopefully it is better for the Town and not just for the developers’ profit margin. We all know that the money these days is in housing and the denser the better.

Consider Turtle Island, zoned Tourist Commercial. The money today is in housing, so what should we expect a builder with a PD to want to build? Is that really what is best for the Town? Does it matter at all that the citizens voted for Tourist Commercial by a 2/3 margin? Does PD eligibility give developers the idea that, hang the zoning and standards, it’s now open season in Loomis?

If you do decide that PDs are needed in Loomis, I hope you will consider whether the ordinance as proposed is adequate or needs some more work. Although some questions we asked at the Commission meeting had oral answers, there was nothing in the ordinance to confirm them. For example, is every property in town now technically eligible to request a PD? Our staff report suggested that it would only be for larger parcels, such as 10 acres or more. But in our rural areas, we have a lot of those. Who determines who gets a PD? A planner? Town Manager? Do the public/neighbors get any weigh-in? Does the Planning Commission have any say? Or is it all approved in the office and there’s no public or Commission/Council input until the first level of approvals comes to the Commission? Shouldn’t the process be spelled out? If this is such an unusual project that it needs a PD, shouldn’t there be some input before it gets to the Commission level for approval? (Ordinarily our zoning and standards provide a large measure of input.) We were told we can turn it down if we don’t like it, but if something is so unusual, wouldn’t it be better to get input before the final product is brought to the Commission? And without any objective standards, how does the Commission really measure whether this is “better” or just seems that way due to a slick presentation? If there are differences from what would normally be expected, at least it would be helpful to know where the differences are and whether we find them acceptable.

This is not to say that nothing in the General Plan or zoning ordinance needs updating. We did rezone for required affordable housing (and perhaps have to do so again on other land if the Village refuses to build it as we anticipated). We have updated Elements such as Housing and Circulation, and from time to time aspects of the zoning ordinance. It may be time to look at the practicality of the Business Park. The General Plan called for reconsidering some commercial on the lower part of Sierra College blvd. It called for this within 3 years, which probably wasn’t realistic at the time. But that concept may be ready for reconsideration now, with the increased development on Sierra College Blvd. and the traffic incoming from the Lincoln area. (Joan Phillippe had some excellent creative ideas for this area.)

I do not say things are set in stone. But I urge caution in quickly adopting a PD ordinance for the whole town. (Does it really need to be for the whole town? We have a lot of rural areas that developers would love to come in and do a PD on and give us some very unrural subdivisions like we have on our borders. All that land! For so many houses!) If you still want to add PD, please consider whether the ordinance as written is ready or still needs some work, and where you would like it improved. Where should it apply? What is the process for getting a PD and who decides? Is there a process for Commission or Council or public input before it is finally brought to the Commission for approval? Overall, is this needed? Does it encourage developers to push the line more than it encourages a “better” project? Are there parts of it that are missing? This is a serious matter that deserves more than a cursory look and passage. If it needs more work or consideration, please take the time. Loomis deserves that.

Thank you.

Jean Wilson, Planning Commissioner

May 3, 2017

(Per Loomis Standard Operating Procedures, I have notified the Commission Chair of my intent to express a viewpoint other than that recommended by the Commission.)